REMARKS

Claims 1-37 were presented for examination. The Examiner rejected claims 1-16, 21-25, 28, 29, 31-34, and 37; and objected to claims 17-20, 26, 27, 30, 35 and 36. Applicants hereby seek to amend claims 1-37, pursuant to the provisions of Rule 116. Support for all amendments is found in the application as originally filed. Reconsideration of this application as amended, and allowance of all claims herein, claims 1-37 as amended, are hereby respectfully requested.

Applicants respectfully submit that the Examiner should enter the offered amendments, because the amendments adopt the Examiner's suggestions and comply with requirements of form. Furthermore, the amendments place the case in condition for allowance. 37 CFR §1.116; MPEP 714.12, 714.13.

Applicants hereby seek to amend their specification in three places to correct typographical errors and to achieve internal consistency with the drawings and remaining portions of the specification. Applicants believe that the Examiner should enter these amendments to the specification, because they are simply matters of form.

Applicants hereby submit as an appendix to this Amendment B replacement sheets for Figures 3, 5, 8, 9, 11, 12, 13, 14, and 15. Replacement sheets 3 and 14 correct typographical errors, and achieve consistency with the other drawings and with the specification. Replacement sheets 5, 8, 9, 11, 12, 13, and 15 add item numbers to the steps illustrated in these Figures, consistent with the specification. Applicants believe that the Examiner should these enter these amendments to the drawings, because they are simply matters of form.

Applicants hereby seek to make numerous minor wording changes to various of their claims. Applicants ask the Examiner to enter these amendments, as they are matters of form.

In his twelfth paragraph, the Examiner rejected claim 37 under 35 U.S.C. §102(e) as being anticipated by Cook.

Applicants are hereby amending claim 37 to more particularly point out novel aspects of their invention. As amended, claim 37 is patentably distinct with respect to Cook, for the following reasons:

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- The Examiner cited Cook's items 114 and 118 for the recitation of a Web application. However, items 114 and 118 are co-located with the buyer's computer 110. Amended claim 37, on the other hand, requires the Web application be located at the seller's Web site.

- Claim 37 recites, in two places, "HTTP requests". Neither "HTTP" nor "HTTP requests" are mentioned in Cook.

- The Examiner cited Cook's on-line mall 108 for the recitation of a "service provided by an entity other than the seller." However, claim 37 requires the Web application to identify those HTTP requests that require a service provided by an entity other than the seller. Cook's analog to Applicants' Web application, ZAPI 118, does not identify when the services of mall 108 as are required.

- The Examiner cited Cook's items 102 and 104 for the recitation of the "interface module adapted to receive a request for service from the Web application, format and transmit the request, receive a response to the request, and forward the response to the Web application." However, claim 37 as amended requires that the interface module be located at the seller's Web site. Cook's items 102 and 104 are not located at the seller's Web site 106.

For the above reasons, the Examiner is requested to withdraw his rejection of claim 37; and to allow this claim as amended.

In his fourteenth paragraph, the Examiner rejected claims 1-3, 5-9, 20, 21, 23-25, 28, 29, and 31-34 under 35 U.S.C. §103(a) as being unpatentable over Linehan in view of Tozzoli.

Applicants are hereby amending their claims to more particularly highlight novel aspects of their invention.

As amended, Applicants' claims are patentably distinct over the combination of Linehan and Tozzoli, for the following reasons:

The only independent claim in the rejected set is claim 1. But claim 1 as amended is patentably distinct over Linehan for the following reasons:

- The Examiner cited column 3 lines 15-23 of Linehan for the recitation of "a filter adapted to redirect HTTP requests received from the Web browser." However, there is no mention of HTTP in the cited passage. In Linehan, the consumer's payment request could be effectuated other than by HTTP. For example, it could be done via an e-mail containing straight ASCII.

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- The Examiner cited <u>Linehan</u> column 3 lines 23-32 for the recitation "coupled to the filter, an Internet server application adapted to receive a redirected HTTP request from the filter and to process the redirected HTTP request." The module performing this analogous function in <u>Linehan</u> is acquirer gateway 106. However, as shown on <u>Linehan</u>'s Figure 1, acquirer gateway 106 is a module that is separate and apart from the merchant (seller) computer 104. Applicants' claim 1, on the other hand, recites that their Internet server application is <u>part of</u> seller's Web site.

- The Examiner cited <u>Linehan</u> column 3 lines 32-39 for the recitation "coupled to the Internet server application, a filter engine adapted to receive the processed HTTP request and to identify an HTTP request that contains data requiring a digital signature by the buyer computer." The module that performs this analogous function in <u>Linehan</u> is acquirer gateway 106. However, acquirer gateway 106 is not part of the seller's Web site, as discussed above. Furthermore, acquirer gateway 106 does not <u>identify</u> an HTTP request that contains data requiring a digital signature by the buyer computer, as required by Applicants' claim 1. "Identifying" implies decision-making. <u>Linehan</u>'s acquirer gateway 106 is a passive element that does not make any decisions. Furthermore, acquirer gateway 106 does not get involved with digital signatures by the buyer computer.

The addition of <u>Tozzoli</u> to <u>Linehan</u> does not strengthen the case against the patentability of claim 1, because <u>Tozzoli</u> does not suggest the elements recited in Applicants' claim 1 as amended. The Examiner cited <u>Tozzoli</u> column 11 lines 52-57 for a filtering procedure performed by something that is analogous to Applicants' filter engine. However:

- The cited passage in <u>Tozzoli</u> does not mention HTTP. HTTP is recited five times in Applicants' claim 1.

- The cited passage in <u>Tozzoli</u> does not suggest the recitation "identify an HTTP request that contains data requiring a digital signature by the buyer computer."

- The tasks performed by the <u>Tozzoli</u>'s filtering operation are performed by <u>Tozzoli</u>'s "system." Column 11 line 52; Figure 2A. The filtering is not performed by the seller. <u>Tozzoli</u>'s Figure 4 clearly shows that his system ("trade system") is distinct from his seller. In claim 1, on the other hand, the filter engine is <u>part of</u> the seller's Web site.

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For the above reasons, the combination of Linehan and Tozzoli does not suggest Applicants' claim 1 as amended.

Claims 2, 3, 5-9, 20, 21, 23-25, 28, 29, and 31-34 all depend from claim 1, which, as described above, is patentable. It follows that these dependent claims are likewise patentable. Additionally, they contain many patentable features in their own right. It is not necessary to discuss all of these features herein.

With respect to claim 8, the Examiner, in his twenty-fifth paragraph stated that "it has been held that ISAPI is an easy-to-use, high-performance interface for back-end applications and has significant performance advantages over the CGI specification, such as having its own dynamic-link library." However, the Examiner gave no support for this proposition. It is incumbent upon him to do so if he want to sustain this rejection.

In his twenty-sixth and twenty-eighth paragraphs (which are directed to claims 9 and 21, respectively) the Examiner cited Linehan for a teaching of HTTP responses and HTTP requests, respectfully. Linehan does not suggest the use of HTTP.

In his thirtieth, thirty-second, and thirty-fourth paragraphs, the Examiner referred to "column 3 lines 62-47." Applicants do not understand what the Examiner meant by "lines 62-47".

In his thirty-sixth paragraph, the Examiner stated, with respect to claim 28, that "it has been held that an abstracted front-end is an easy-to-use, high-performance interface for linking to back-end applications." However, the Examiner gave no support for this proposition. It is incumbent upon him to do so if he wants to sustain this rejection.

With respect to the Examiner's rejection of claim 20, it is noted that, in his fifty-eighth paragraph, the Examiner merely objected to claim 20, indicating that the parent of claim 20, claim 17, would be allowable if rewritten into independent form. Applicants are so rewriting claim 17 into independent form in this Amendment B. Therefore, it follows that claim 20 as amended is allowable. Similarly, claim 21 depends upon claim 20, and is therefore also allowable.

For the above reasons, the Examiner is requested to withdraw his rejection of claims 1-3, 5-9, 20, 21, 23-25, 28, 29, and 31-34; and to allow these claims as amended.

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In his forty-fourth paragraph, the Examiner rejected claims 4 and 22 under 35 U.S.C. §103(a) over "SET in view of Tozzoli as applied to claim 2 above, and further in view of Linehan". However, in his fourteenth paragraph, the Examiner equated "SET" with "Linehan". Therefore, Applicants will treat this rejection of claims 4 and 22 as a rejection over the combination of Linehan and Tozzoli.

Applicants are hereby amending claims 4 and 22 to more particularly highlight novel aspects of their invention.

Claim 4 is a dependent claim depending upon claim 1, which, as described above, is patentable. Therefore, it follows that claim 4 is patentable as well.

The dependency of claim 22 is being changed, so that claim 22 now depends upon claim 21, which, in turn, depends upon claim 20, which, in turn, depends upon claim 17. Applicants are hereby amending claim 17 to rewrite it into independent form, as suggested by the Examiner in his fifty-eighth paragraph, where he merely objected to claim 17. Therefore, it follows that 22 as amended is patentable.

For the above reasons, the Examiner is requested to withdraw his rejection of claims 4 and 22; and to allow these claims as amended.

In his forty-ninth paragraph, the Examiner rejected claims 10-16 under 35 U.S.C. §103(a) over Linehan in view of Tozzoli and further in view of Lin.

Applicants are hereby amending claims 10-16 to more particularly highlight novel aspects of their invention.

Claims 10-16 are dependent claims depending upon claim 1, which, as discussed above, is patentable. Therefore, it follows that claims 10-16 are patentable as well. While Lin shows the use of a hash table, the purpose of Lin's hash table is different than the purpose of the hash table in the present invention. Lin's hash table is used by an intermediate-tier server to authenticate a client that is attempting to gain access to a remote data repository. In the present invention, on the other hand, the hash table is sent by an Internet server application located at a seller's Web site to a filter engine, also located at the seller's Web site, in order to help the filter engine identify those HTTP requests that contain data requiring a digital signature by the buyer computer, as recited in claim 1.

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For the above reasons, the Examiner is requested to withdraw his rejection of claims 10-16; and to allow these claims as amended.

In his fifty-eighth paragraph, the Examiner objected to claims 17-20, 26, 27, 30, 35, and 36 as being dependent upon a rejected base claim. The Examiner indicated that these claims would be allowable if rewritten into independent form, including all of the limitations of the base claim and any intervening claims.

It is noted that the Examiner indicated that claim 20 is one of the claims that would be allowable if its parent claim (claim 17) were rewritten into independent form. The Examiner made this observation concerning claim 20 despite the fact that he rejected claim 20 in his fourteenth paragraph. These two stances with respect to claim 20 are inconsistent. Applicants submit that the way to resolve this inconsistency is to note that, since claim 20 depends upon claim 17, the patentability of claim 20 follows from the patentability of claim 17. Therefore, the Examiner should not have rejected claim 20 in his fourteenth paragraph.

With respect to claim 17, Applicants are hereby correcting "Internet service application" to "Internet server application."

With respect to claim 18, Applicants are hereby correcting a typographical error in the dependency of said claim.

With respect to claim 19, Applicants are hereby:

● Correcting a typographical error in the dependency of said claim.

● Adding the words "at least one of" to line 2, consistent with the specification.
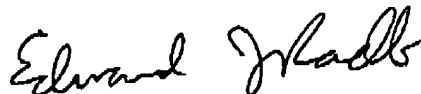
● Correcting a typographical error in line 3.

Applicants are hereby rewriting claims 17-20, 26, 27, 30, 35, and 36 into independent form as suggested by the Examiner. Out of these claims, claims 17, 26, 30, 35, 36 are now in independent form. Claims 18-20 are dependent claims depending upon independent claim 17. Claim 27 is a dependent claim depending upon independent claim 26.

For the above reasons, the Examiner is requested to withdraw his objection to claims 17-20, 26, 27, 30, 35, and 36; and to allow these claims as amended.

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Applicants believe that this application is now in condition for allowance of all claims herein, claims 1-37 as amended, and therefore an early Notice of Allowance is respectfully requested. If the Examiner disagrees or believes that, for any other reason, direct contact with Applicants' attorney would help advance the prosecution of this case to finality, he is invited to telephone the undersigned at the number given below.

Respectfully submitted,

date of signature: November 14, 2005

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